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1 A Yes, I did.

2 Q Why did you think it would be a good idea to take
3 him into the first aid trailer?

4 A It had been a pretty hot day and a pretty long
5 practice and I thought it would be a good idea,
6 more as a preventive measure, to get him inside.

7 Q What was it about him that made you think he
8 should go in the trailer?

9 A I just kind of wanted to see how he was doing.
10 But it was more preventive. There really wasn't
11 anything that said to you he was having problems.

12 Q Did you talk to him?

13 A He went into the trailer, jumped up on one of the
14 tables, and that's when I gave him some water and
15 asked him how he was.

16 Q Okay. Between the time you first got to where he
17 was kneeling on one knee to the time he got into
18 the trailer, did he ever say anything to you?

19 A From the first time I asked him how he was, he
20 ignored me, went to the bag and then into the
21 trailer, but up to that point, no, he did not say.

22 Q Now, when he got into the trailer, who else was in
23 the trailer?

24 A D.J. would have been the only one around, but I
25 don't remember if he followed me in or not.

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1 Q So there was no one in the trailer as you walked
2 in?

3 A No.

4 Q And so it was just you and Korey Stringer inside
5 the trailer?

6 A As far as I remember, correct.

7 Q Before July 31st, 2001, had you had any training
8 as to what the purpose of the trailer was?

9 A We had just kind of talked with Chuck just how it
10 would be -- you know, if anyone was having
11 problems, to get them out of the heat, it would be
12 a good place. This is the first year we had the
13 trailer.

14 Q When did you have this talk with Chuck?

15 A It was prior to training camp. I don't remember.
16 It was just kind of a brief, informal thing. But
17 I don't know if he necessarily specified, you
18 know, this is what the trailer is specifically
19 used for.

20 Q Had you been in the trailer and been shown by
21 anyone what the supplies for first aid purposes
22 were in the trailer?

23 A I don't know if it was myself, but some of the
24 other interns or certified athletic trainers
25 stocked it so we knew what was in there.

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1 Q Had you, yourself, ever walked around inside the
2 trailer to identify all the supplies that were in
3 there?

4 A Yes, I did.

5 Q And when did you do that?

6 A We would have put some stuff in there probably
7 before training camp started and then early that
8 morning, we would have been in there to kind of
9 see what was in there.

10 MR. O'NEAL: Early what morning?

11 A Early before practice, Tuesday morning.

12 Q That's July 31st?

13 A Correct.

14 Q You hadn't been in the trailer before July 31st?

15 A I had at various times to set things up.

16 Q Could you tell me everything you recall being in
17 that trailer for the purpose of heat illness?

18 A Just for the purpose of heat illness?

19 Q Yes.

20 A As far as heat -- I know there were -- I'm not
21 sure if there was a cooler of water. If there
22 was -- I'm not sure if it was exactly in the
23 trailer or right outside the door, but there would
24 have been a cooler probably with ice bags, I
25 believe, in there. But not specifically for heat

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1 illness, we had a spinal board in there.

2 Q Is that all you recall?

3 A We had two tables, treatment tables in there, I
4 believe.

5 Q Anything else you recall?

6 A Not that I recall.

7 Q Did you have any kind of fan in there?

8 A There's an air conditioner built in there that has
9 a fan.

10 Q Okay. But did you have any portable fans?

11 A No portable fans that I know of.

12 Q Did you have any ice towels in the trailer?

13 A I don't believe in the trailer.

14 Q And you're not even sure if you had water in the
15 trailer? It may have been outside; is that
16 correct?

17 A Yes, correct.

18 Q Did you have any Gatorade in the trailer?

19 A We might have. I'm not sure.

20 Q Now, when you told Korey, after he hit Big Bertha,
21 that you wanted him to go in the trailer, where
22 was Coach Tice?

23 A I do not recall where he was.

24 Q Did you have any discussion with Coach Tice during
25 this time when you were over with Korey that we've

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1 been talking about?

2 A No, not that I can recall.

3 Q Did you have any discussion with any of the
4 coaches while you were over there?

5 A No.

6 Q Did you have any discussions with any of the
7 offensive linemen while you were over there?

8 A No.

9 Q Did you talk to anyone or did anyone talk to you
10 like, "Boy, look at Korey," anything like that?

11 A No, no one talked to me.

12 Q You had no discussions with anyone?

13 A No.

14 Q Okay. Now, you got Korey inside the first aid
15 station. I assume he walked by himself in?

16 A Yeah. He actually jogged into the trailer.

17 Q Did you tell him not to jog?

18 A No. I just wanted to try and convince him to get
19 into the trailer. He's not a guy that likes the
20 athletic trainers, you know --

21 MR. O'NEAL: She just asked you if you
22 tried to convince him so stick to her question.

23 A No, I did not.

24 Q Now, when you got him into the trailer, what's the
25 first thing you recall?

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1 A The first thing, he went and jumped up on one of
2 the tables.

3 Q Without your asking him?

4 A Correct.

5 Q Did you talk to him then?

6 A I went and I got him some water, actually, to
7 drink.

8 Q Do you recall if you had to go outside the trailer
9 to get the water?

10 A I don't remember. I got a water bottle. I'm not
11 sure if D.J. gave me that or -- I believe he
12 filled it up from outside.

13 Q Did D.J., at some point, come into the trailer?

14 A He was in there for a brief time.

15 Q When you got to the trailer, there was no one in
16 there?

17 A Correct.

18 Q You walked in with Korey?

19 A Hm-hm.

20 Q And then D.J. came in?

21 A I believe sometime later. I'm not exactly sure.

22 Q How much time later?

23 A I really don't -- maybe five minutes.

24 Q How long was D.J. in the trailer?

25 A Very brief.

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1 Q He came in; you told him to go get you some water?

2 A I'm not exactly sure. I believe I did.

3 Q And then he left the trailer and came back with
4 the water bottle?

5 A He would have come back, yes. I'm not sure how
6 that all -- but then he went -- after he came in
7 and gave the water, he would have left to go clean
8 up the water caddies and put them away.

9 Q So you were in the trailer at least -- or five
10 minutes, just you and Korey, before D.J. came in.
11 During that five minutes, did Korey Stringer speak
12 to you at all?

13 MR. O'NEAL: I'll object to the form of
14 the question in that his testimony about five
15 minutes was an estimate, but go ahead.

16 A Yeah, as far as the time, I wasn't sure. But
17 prior to D.J. coming in with the water, he did not
18 speak with me that I recall.

19 Q And how long do you think you were on the field
20 from the time you first saw Korey when he was
21 kneeling on one knee to the time that you entered
22 the first aid station?

23 A From kneeling to going into the trailer, that was
24 a short amount of time. I'm not exactly sure how
25 much, but less than five minutes.

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1 Q So in the first five to ten minutes that you were
2 with Korey Stringer, he never spoke to you at all;
3 is that correct?

4 A Approximately. I'm not sure about the times.

5 Q But he still hasn't spoken a word; is that
6 correct?

7 A Coming in -- well, after D.J. left, I remember him
8 being frustrated about having to come into the
9 trailer.

10 Q No. I'm talking up to the time that D.J. comes
11 in.

12 A No.

13 Q He still hasn't said a word?

14 A No.

15 Q Did you see him talk to anyone while he was out on
16 the field?

17 A During practice or --

18 Q No. From the time you got there when he was down
19 on one knee to the time you got him into the
20 trailer.

21 A No.

22 Q Did he speak to anybody?

23 A No, not that I know of.

24 Q Okay. Now, he's been in the trailer for five
25 minutes and you say he climbed up on one of the

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1 tables. Now, during that first five minutes until
2 D.J. came in, did he do anything else?

3 MR. O'NEAL: Again, I'll object as far
4 as the time being an estimate. Go ahead.

5 A Yeah, it might have been shorter than five
6 minutes. But prior to D.J. coming in, no, he did
7 not say anything.

8 Q Okay. And during that period of time, from the
9 time you got into the trailer till the time D.J.
10 came in, did you call anyone for help?

11 A No, I did not.

12 Q Did you do anything for Korey Stringer in that
13 period of time?

14 A I gave him some water.

15 Q Well, I thought you said you sent D.J. to get the
16 water.

17 A Yeah. When he came back, I gave him the water.

18 Q I'm not talking when he comes back. I'm still in
19 the time from the time you walk in the trailer to
20 the time D.J. shows up. Did you do anything at
21 all for Korey Stringer during that time?

22 A No.

23 Q Now, D.J. comes in. How long was D.J. in?

24 A I'd say around a minute or so. Pretty short.

25 Q And then you sent him outside to get you a water

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1 bottle?

2 A Hm-hm.

3 Q And then how long was he gone?

4 A Very short. It's right outside the door. There's
5 a little table.

6 Q And then he came back in with the water bottle?

7 A Hm-hm. (Witness moves head up and down.)

8 MR. O'NEAL: That's yes? It's hard for
9 her to write down hm-hms.

10 A Yes. Sorry.

11 Q How long was D.J. inside with you when he came
12 back with the water bottle?

13 A That was very short. I believe he gave me the
14 water bottle and then he left to go outside to
15 clean up.

16 Q So maybe another minute?

17 A Around that. Maybe a little less.

18 Q Okay. Now, up to the time that D.J. left to clean
19 up, had Korey Stringer said anything?

20 A Up to the time that D.J. left?

21 Q The second time, when he went to clean up.

22 A Not that I can recall.

23 Q Okay. Now, you've got this water bottle and you
24 go over and give it to Korey?

25 A Hm-hm. (Witness moves head up and down.)

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1 Q And what do you say to Korey?

2 A "You need to drink some water, Korey."

3 Q And did you watch him drink it?

4 A Yep.

5 Q How much did he drink?

6 A I would say like one or two sips. Not too much.

7 Q Did he talk to you when you gave him the water?

8 A No, he really didn't say anything.

9 Q And then what did you do?

10 A Then I just kind of let him relax in the trailer.

11 Q Did you call anyone for help?

12 A No, I did not.

13 Q How long do you think you just kind of let him
14 relax in the trailer?

15 A I would say it would have been between about five,
16 ten minutes. And then he was sitting up. He
17 moved around a number of times in the trailer. At
18 one point, he was on the ground -- I would say
19 after about five, ten minutes, he was on the floor
20 of this trailer and he sat up and asked me if I
21 could take his shoes and socks off and cut off the
22 tape on his ankles.

23 Q When you're saying five to ten minutes, you're
24 saying from the time -- after you gave him the
25 water, another five to ten minutes goes by when

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1 you're letting him relax in the trailer?

2 A I would say from the first time he came in till
3 about the time I cut off his tape was about ten
4 minutes.

5 MR. O'NEAL: And remember to let her
6 finish her question.

7 BY MS. ROSELLE:

8 Q Okay. So we have something less than five minutes
9 that you were on the field with him and then we
10 have ten minutes up to the time that you cut the
11 tape; is that correct?

12 A I believe I said something more like five to ten
13 minutes after practice is when I heard the call.

14 Q No, no. I'm saying after you -- I'm sorry. Let's
15 go back. From the time you first got to Korey,
16 where he was kneeling, until the time he went into
17 the trailer you said was something less than five
18 minutes, correct?

19 A Correct.

20 Q Okay. And then you're saying from the time he
21 gets into the trailer to the time you cut off the
22 tape is ten minutes?

23 A Approximately.

24 Q And during this entire period of time, you have
25 not called anyone for help; is that correct?

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1 A Correct.

2 Q But you had Chuck Barta's cell phone, didn't you?

3 A Yes, I did.

4 Q And you knew that you could use that phone to call
5 people, right?

6 A Yes, I did.

7 Q Who did you think you could call with that phone?

8 A With that one, pretty much anyone, whoever I
9 needed to. I had a phone list. Chuck was going
10 to be gone so he said if anything comes up, call
11 Fred.

12 Q So you could call Fred with the phone?

13 A Hm-hm. (Witness moves head up and down.)

14 Q Did Fred have a phone number?

15 A It would have been the athletic training room I
16 would have called. Chuck had said that Fred would
17 be in the athletic training room.

18 Q So you had a number where you could call Fred?

19 A Correct.

20 Q Did you have a number for Gold Cross Ambulance?

21 A Yes, I did.

22 Q Was it your understanding you could have called
23 Gold Cross?

24 A Yes.

25 Q Did you need anyone's authorization to call Gold

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1 Cross?

2 A No, I did not.

3 Q Did you have the phone numbers for physicians,
4 such as Dr. Knowles and Dr. Fischer?

5 A I believe so. I think we furnished you the list,
6 but that whole list. It was like all the training
7 camp numbers.

8 Q So you could have called anybody?

9 A There was a variety of numbers on there.

10 Q And have you heard of 911?

11 A Yes, I have.

12 Q Okay. What's 911?

13 A That's to call for an emergency.

14 Q Okay. And you could have called 911?

15 A Correct.

16 Q Okay. Now, at the end of ten minutes, in the
17 trailer, has Korey Stringer said anything to you?

18 MR. O'NEAL: Object to the form of the
19 question in that the times are all estimated.

20 A I can only tell you at approximately about -- we
21 were in the trailer for about ten minutes is when
22 he sat up. You know, everything -- at that point,
23 you know, I thought he was doing really well. He
24 was like, "Oh, can you cut off" -- you know, take
25 his shoes off and cut off his ankle tape.

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1 Q So at that point, he asked you to cut off his
2 ankle tape and take off his shoes?

3 A Correct.

4 Q And did you think it was at all unusual for a
5 player to ask you to take off his ankle tape and
6 shoes?

7 A No. That's pretty normal for a guy after practice
8 to do that.

9 Q Was Korey still sweating at that time?

10 A I'm sure he was. When I gave him the water, I
11 believe I brushed up on his arms and could tell
12 that he was sweating. His skin was cool and
13 moist.

14 Q Did you suggest to him that he take off any
15 clothing?

16 A He pretty much was down to his T-shirt because he
17 removed his pads. All the linemen do that before
18 they do their drills.

19 Q Did you suggest he take off his T-shirt?

20 A No, I did not.

21 Q Did you get any ice towels?

22 A No, I did not.

23 Q Did you get any ice and rub it on him?

24 A Actually, I think -- if we go back, I might have
25 had an ice towel. I'm not sure when I first got

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1 the first one.

2 Q Did you consider rubbing ice on his body?

3 A At that point, no, I didn't think he needed that.

4 Q Did you consider putting any ice around his neck
5 or under his arms or in the groin area?

6 MR. O'NEAL: Asked and answered.

7 A No.

8 Q You had ice in the cooler right outside the door
9 of the trailer, correct?

10 A Correct.

11 Q So had you wanted to get ice, you could have done
12 that, correct?

13 A Correct.

14 Q Did you have any alcohol in the trailer?

15 A Not that I know of, no.

16 Q Could you have taken a piece of paper and made a
17 fan and fanned Korey?

18 A I don't know if I had any paper. I had that
19 little sheet, but that was about it.

20 Q Did you consider fanning him?

21 A No, I did not.

22 Q Now, when you bent down to take off his ankle
23 tape, shoes, and socks, you took all three off?

24 A Hm-hm. (Witness moves head up and down.)

25 Q Were his socks wet with sweat?

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1 A I believe they were.

2 Q When you took the socks off, were his feet wet?

3 A I don't recall. I believe so, but I'm not sure.

4 Q Were his legs wet with sweat?

5 A I'm not sure.

6 Q Now, how long did it take you to cut off the ankle
7 tape and the shoes and take off the shoes and
8 socks?

9 A Couple minutes.

10 Q Two?

11 MR. O'NEAL: I'll object as no one can
12 remember that specifically, but --

13 A Yeah, I don't -- maybe a little bit longer.

14 Q Now, when you're cutting off the shoes and the
15 sock -- I'm sorry, cutting off the tape and taking
16 off the shoes and the socks, where is Korey
17 physically located?

18 A He's -- he was off that first table. He was
19 sitting on the floor.

20 Q Okay. Do you know why he jumped off the table
21 onto the floor?

22 A No, I don't.

23 Q Now, other than his asking you to cut off the
24 ankle tape and take off his shoes and socks, did
25 he say anything to you?

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1 A After I took it off, I believe he said, "Thank
2 you."

3 Q Anything else he said to you?

4 A No.

5 Q Did you ask him any questions to do any type of an
6 assessment of him?

7 A At that point, no.

8 Q Okay. Now, after the shoes and socks were off,
9 then he got up and you advised him to drink some
10 cold water?

11 A Yes, and I believe he took some.

12 Q So this was the second time he had some sips?

13 A I believe so.

14 Q How many sips did he take this time?

15 A I don't remember.

16 Q It was from the same water bottle?

17 A Correct.

18 Q Where was he standing or sitting when he took
19 those sips?

20 A I don't recall.

21 Q Did you at any time check the temperature in the
22 trailer?

23 A Prior to that day, I don't remember. The one
24 thing I can tell you: It was pretty cold because
25 when I walked in there with my sunglasses, they

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1 steamed up or kind of condensed from the cold.

2 Q How long did it take Korey to drink this water?

3 A Not very long.

4 Q But it's the same water bottle?

5 A Yeah.

6 Q Okay. Then Korey got up and proceeded to sit on
7 the treatment table; is that correct?

8 A Correct.

9 Q Is that the same treatment table?

10 A I believe so. He was moved around between the
11 tables, but I believe when he sat on that, it was
12 that first table.

13 Q So he sat on the table and then he got off the
14 table and began moving around or was he moving
15 around on the table?

16 A No, when he was up on the table, he was sitting up
17 there, kind of propped, with his arms up, just
18 holding himself up there.

19 Q And then he began humming?

20 A Yep.

21 Q What was he humming?

22 A I couldn't make out the tune but he was just kind
23 of humming to himself and bopping his head back
24 and forth.

25 Q So he's bopping his head and moving his arms?

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1 A No. Just his head.

2 Q Well, this says, "moving his arms to the beat."

3 MR. O'NEAL: By "this," you're
4 referring to --

5 MS. ROSELLE: Exhibit 48.

6 MR. O'NEAL: Thank you.

7 BY MS. ROSELLE:

8 Q "Korey got up and proceeded to sit on the
9 treatment table and began humming and moving his
10 arms to the beat."?

11 A I think it was more kind of like shoulders, not
12 like arms.

13 Q But he's moving part of his body to this beat?

14 A Correct.

15 Q Could you hear the beat or was this his beat?

16 A It was kind of his own beat, but you could make
17 out that he was humming a song but I wasn't aware
18 what.

19 Q Okay. But my question is: Could you tell whether
20 he was actually moving to the beat or if he was
21 both humming and moving but not necessarily to any
22 beat?

23 A I can't tell you if he was on beat or -- no.

24 Q And how long do you think it was that he --
25 between the time you cut off the ankle tape and

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1 the shoes and socks to this time when he began
2 humming and moving his arms and torso to the beat?

3 A I'm really not sure how much time passed.

4 Q Couple more minutes?

5 A I would say longer than that.

6 Q Five minutes?

7 A Probably longer.

8 Q Ten minutes?

9 A Ten or longer, approximately. I'm not sure.

10 Q 15?

11 A I really don't know.

12 Q So at this time, he's been in this trailer
13 somewhere between 22 to 30 minutes?

14 MR. O'NEAL: Give your best estimate,
15 Paul. That's all anyone can ask.

16 A Yeah, approximately 20 minutes. I'm not exactly
17 sure. I never looked at my watch.

18 Q Okay. At least 20 minutes?

19 A Probably.

20 Q Maybe more?

21 A Maybe more.

22 Q And during this entire time, you've not used that
23 cell phone at all?

24 A No.

25 Q You have not gotten any ice towels to cool him

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1 down at all?

2 A I had some ice towels and I don't remember the
3 first time I used them.

4 Q You haven't gotten any ice to put on any part of
5 his body?

6 A No ice, no.

7 Q Didn't try to make a fan or anything?

8 A No.

9 Q And didn't call for an ambulance?

10 A No.

11 Q Now it says, "I called into the ATR." What's
12 that?

13 A Athletic training room.

14 Q "To send someone out with a cart to pick Korey and
15 myself up." Why did you do that?

16 A That's kind of general procedure that if we're
17 going to bring a guy in, that we'll take a cart.

18 Q So there wasn't anything about Korey that you
19 thought required a cart; you were just following
20 general procedure?

21 A Hm-hm. (Witness moves head up and down.)

22 MR. O'NEAL: Is that yes?

23 THE WITNESS: Yes. Sorry.

24 MR. DeMARCO: Say yes only when you
25 mean yes because she can't take it down otherwise.

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1 BY MS. ROSELLE:

2 Q Now, during this entire 20 minutes or more that
3 you and Korey were in this trailer, other than him
4 asking you to cut off his ankle tape and take off
5 his shoes and socks and then thanking you for
6 doing that, did he say anything to you?

7 A He might have. Not that I can recall, though.

8 Q And you said nothing else to him other than what
9 you've told us?

10 A After I called into the athletic training room, I
11 said, "Korey, we're going to bring the cart here
12 and we're going to take you inside."

13 Q So it's just you and Korey sitting in this trailer
14 for about 20 minutes or more?

15 A Hm-hm. (Witness moves head up and down.)

16 MR. O'NEAL: That's yes?

17 A Yes.

18 Q What were you thinking?

19 A I was just kind of letting him kind of relax in
20 there and then calling in. Because there were
21 still people outside cleaning up and stuff.

22 Q So you could have gone to the door and hollered
23 and gotten people to come help you, right?

24 A Correct, yes.

25 Q There were people, what, five, ten yards from the

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1 edge of the trailer?

2 A Approximately.

3 Q And some of those people were athletic trainers?

4 A No. Those -- I think there were some coaches
5 walking around. Some of the coaches take laps
6 after practice and some players.

7 Q Like both Coach Tices?

8 A I don't remember who exactly.

9 Q But you do know that right outside the trailer,
10 there were some coaches taking laps?

11 MR. O'NEAL: We'll object to that as
12 vague in terms of what right outside the door
13 means.

14 MS. ROSELLE: I'll rephrase it.

15 BY MS. ROSELLE:

16 Q How far from the trailer were these coaches taking
17 laps?

18 A I believe they took laps on that first field, so
19 it's pretty close. Within 50 feet.

20 Q And had you gone to the door and screamed, they
21 would have heard you?

22 A Yes.

23 MR. O'NEAL: Object in that there's no
24 foundation for that.

25 BY MS. ROSELLE:

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1 Q Why did you wait 20 minutes or more before you
2 called the athletic training room to send somebody
3 with a cart?

4 A A lot of times, they're pretty busy after practice
5 and, letting the guys get back in after cleaning
6 up, there really wouldn't have been anyone around
7 to come out before that.

8 Q Why didn't you just take Korey by the arm and walk
9 over there?

10 A I wanted him to stay in that cool house and then
11 usually use that cart. That's our usual
12 procedure.

13 Q So you thought it was necessary for Korey to be in
14 a cool place?

15 A Preventively, yes.

16 Q You didn't recognize that this was an emergency at
17 all?

18 A No, I did not.

19 Q And you didn't recognize any symptoms of heat
20 illness when you were in that trailer for over 20
21 minutes with Korey Stringer; is that correct?

22 A Well, what do you mean by heat illness?

23 Q Any kind of heat illness: Cramps, heat
24 exhaustion, heatstroke.

25 A No.

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1 MR. O'NEAL: And I'll object as to time
2 in terms of how long he was in the trailer.

3 BY MS. ROSELLE:

4 Q Okay. How long did it take someone to get -- to
5 bring a cart to pick you and Korey up?

6 A I remember it took a little bit longer than I
7 thought. Approximately five, ten minutes. That's
8 just an estimate.

9 Q Okay. And during that five- or ten-minute period,
10 did Korey Stringer say anything to you?

11 A No, he did not. Sometime before the cart arrived,
12 I remember he got off, I believe, that first table
13 and walked over kind of more towards the door,
14 right in the middle of the floor, and just kind of
15 sat down and laid down.

16 Q Laid down on the floor of the trailer?

17 A Yes.

18 Q And did you say anything to him during that five
19 to ten minutes?

20 A No, I did not. I just told him, after I called
21 D.J., that there's a cart coming out and that's
22 when he moved more towards the door.

23 Q Okay. You've been in this trailer with Korey
24 Stringer approximately 30 minutes by this time and
25 the only thing he had said to you was would you

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1 cut off his ankle tape, his shoes and socks, and
2 then thank you; is that correct?

3 A As far as I can recall.

4 Q Didn't you think it was strange that, for a whole
5 half hour, he didn't talk to you?

6 MR. O'NEAL: Object as argumentative.

7 A No.

8 Q Didn't you think you needed to make some kind of
9 an assessment as to how he was doing?

10 A When I had taken the ankle tape and stuff off, he
11 was lucid and still sweating. He was doing fine.
12 I thought everything was normal.

13 Q Well, now, how do you know if he was still lucid
14 if you weren't talking to him?

15 A Well, he talked to me and said could you please
16 take off his ankle tape and said thank you after I
17 did it.

18 Q How long did he lay back down on the floor by the
19 door?

20 A Just from that little time, from when I called in
21 to send out for a cart to when they came out, but
22 I'm not sure exactly how long.

23 Q Now, the next thing this Exhibit 48 says is, "I
24 applied several ice towels to Korey's body to keep
25 him cool." When did you do that?

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1 A That I don't remember the first time that I got
2 him the ice towels.

3 Q Where did you go to get the ice towels?

4 A I believe -- I never left the trailer, so I
5 believe D.J. must have dropped them off or there
6 was a cooler in there with ice towels.

7 Q Do you know how long you applied ice towels to
8 him?

9 A When I applied them, I would have left them right
10 on him.

11 Q Do you know where you applied them?

12 MR. O'NEAL: You mean where on his
13 body?

14 MS. ROSELLE: Yes.

15 A Where on his body? The only thing that I can
16 remember about ice towels is I remember putting
17 one up on his forehead and that's when he kind of
18 pushed it away. He didn't want that on his
19 forehead.

20 Q Did you say anything to him like, "Leave it
21 there"?

22 A No.

23 Q You just let him push it away?

24 A Hm-hm.

25 Q He didn't say anything to you, you didn't say

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1 anything to him, you just let him push it away; is
2 that right?

3 A Correct.

4 Q Do you recall anywhere else on his body you
5 applied these ice towels?

6 A No, I don't.

7 Q And you don't remember how many ice towels there
8 were?

9 A No.

10 Q And you don't remember where in this time period
11 it was when you put the ice towels on him?

12 A No, I don't.

13 Q Do you remember why you did that?

14 A I just wanted to kind of keep him cool before he
15 went outside.

16 Q The next sentence here says, "DJ arrived on the
17 cart and we tried to get Korey up but he was
18 semiconscious." Okay. D.J. came with the cart
19 and then he came inside the trailer?

20 A Yes.

21 Q And now there's you and D.J. and Korey in the
22 trailer; is that correct?

23 A Correct.

24 Q And Korey's laying on his back on the floor?

25 A Yes.

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1 Q And the two of you are going to get him up?

2 A Yes.

3 Q What did you do to get him up?

4 A We kind of each knelt on one side and we're like,
5 "Korey, the cart's here. Let's get up."

6 Q What did he do then?

7 A He didn't say anything. He was unresponsive to
8 us.

9 Q Okay. Is being unresponsive what you're calling
10 semiconscious?

11 A The reason I said semiconscious was because I know
12 it was kind of right before D.J. got there is when
13 he kind of pushed the towel away.

14 Q Was he laying on the floor when he pushed the
15 towel away?

16 A Yes, he was.

17 Q Okay. So by the time D.J. comes with the cart,
18 Korey Stringer's unresponsive and could not get up
19 by himself; is that right?

20 A Correct.

21 MR. O'NEAL: Object. Multiple in form,
22 lack of foundation.

23 MS. ROSELLE: We'll break it down.

24 BY MS. ROSELLE:

25 Q By the time D.J. gets there with the cart, Korey

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1 Stringer cannot get up by himself; is that
2 correct?

3 MR. O'NEAL: Lack of foundation.

4 A I believe so, yes.

5 Q You told him to stand up?

6 A Yeah. I told him, "Let's get up, Korey. The
7 cart's here. Let's go outside."

8 Q And he didn't move?

9 A Correct.

10 Q And then you and D.J. knelt down to try to help
11 him up?

12 A We were kneeling down kind of trying to get behind
13 him to lift him up as -- and that's when he
14 wouldn't get up.

15 Q So did you first ask him to stand up and he was
16 unresponsive and then you knelt down and the two
17 of you tried to push him up?

18 A I don't remember how -- if we asked him before we
19 knelt down.

20 Q Did he get up that time?

21 A No.

22 Q Was it possible for you and D.J. to lift up Korey
23 Stringer?

24 A For us two, it would have been pretty tough,
25 especially to make -- there were stairs going down

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1 so it would have been --

2 Q Okay. So he's laying on the ground and the two of
3 you can't get him to get up, nor can you push him
4 up, and he's unresponsive when you talk to him; is
5 that correct?

6 A Correct.

7 Q Are his eyes open or closed?

8 A I believe they were open the whole time.

9 Q Is he staring at something or are they just kind
10 of staring?

11 A I don't recall.

12 Q How long do you think you and D.J. tried to get
13 Korey up?

14 A It was -- just that one time when we tried getting
15 him up and he wouldn't get up and that's when I
16 told him, "Hurry up. Get me some ice towels and
17 go get Fred."

18 Q At this point when Korey's laying on the ground
19 and you tell him to get up and he can't get up,
20 did you have any sense of urgency?

21 A This was the first sign where, you know, something
22 was wrong and I was concerned and that's the first
23 time I checked his vitals. His breathing was
24 normal and that's the first time I took his pulse.

25 Q Okay. And just so I'm clear, that's about 30

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1 minutes after the time that you first get in the
2 trailer is the first time you checked his vitals?

3 A Approximately.

4 Q What did you do to check his vitals?

5 A Basically, I was, you know, checking the ABCs:
6 Airway, breathing, circulation.

7 Q What did you do to check the airway?

8 A I could tell that he was breathing, just from his
9 movements and seeing his chest rise and fall; and
10 then with the pulse, I took it at his wrist.

11 Q And what was his pulse rate?

12 A I don't remember checking, you know, exactly how
13 many beats per minute but just making sure he had
14 a pulse and making sure it wasn't a very rapid
15 pulse, which would indicate a more serious
16 condition.

17 Q All right. So by this point in time when you
18 can't get him up, it crossed your mind that he may
19 have no pulse?

20 MR. O'NEAL: I'll object to the form of
21 the question. Go ahead.

22 A I'm not sure what you mean.

23 Q Well, if you're checking his pulse to make sure he
24 had a pulse, that means that you had some question
25 in your mind whether he had a pulse, right?

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1 MR. O'NEAL: I'll object. That's not
2 what it means. Go ahead.

3 A No. I knew he had a pulse because he was
4 breathing, but I wanted to see more if it was fast
5 or slow. That's why I checked his pulse.

6 Q And what did you find?

7 A It was steady but not as weak. Or I don't know if
8 I'd call it weak, but it wasn't -- I thought it
9 might be a little bit faster than it was.

10 Q So it was steady but slow?

11 A Yes. It wasn't real fast.

12 Q Did you count the beats per minute?

13 A No, I did not.

14 Q So you just kind of put your hand on -- or your
15 fingers on his wrist, felt for the pulse and
16 wanted to see if it was fast or slow or whatever?

17 A Yeah. I was looking -- that's the first time I
18 was concerned so I wanted to make sure he wasn't
19 going into heat exhaustion where he'd have a rapid
20 pulse and sweating a lot.

21 Q Did you have a thermometer in that trailer?

22 A I did not, no.

23 Q Did it ever enter your mind that maybe you better
24 take his temperature?

25 A I don't believe I really thought about that

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1 because I didn't have anything to measure that.

2 Q Now, at the time that he's laying on the floor of
3 the trailer, you come over to him and you tell him
4 to get up and he doesn't move, did you think that
5 maybe he had a heat illness?

6 A Could you repeat that?

7 MS. ROSELLE: Sure. Read it back.

8 (The last question was read.)

9 A At that time, I was kind of confused because that
10 was the first sign that something was going wrong.
11 Up to that point, he was doing fine. Everything
12 looked okay and then -- I really wasn't sure what
13 was going on at that point. I was pretty
14 confused.

15 Q When you say everything looked okay, can you be
16 specific what you're referring to?

17 A Just that he had no problems with his breathing or
18 never at all mentioned to me that he was having
19 any problems.

20 Q Well, he didn't talk to you other than to ask you
21 to take off the tape and his shoes and socks and
22 to say thank you.

23 A Normally, though, if someone's having problems,
24 they'll say, hey, you know, something's going on.

25 Q So the fact that he didn't tell you he was having

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1 problems you took as a sign that everything was
2 okay because he was still breathing?

3 MR. O'NEAL: Object as argumentative,
4 multiple in form.

5 A I'm not sure what you . . .

6 Q Okay. You're in this trailer with Korey Stringer
7 for a half hour or so. He hasn't spoken to you at
8 all except to ask you to take off the tape and the
9 shoes and socks and then to say thank you to you.
10 He's still breathing?

11 A Yes.

12 Q And from those facts, you concluded that
13 everything was okay. Is that your testimony?

14 A Yes. He was sweating. You know, he had a pulse.

15 Q Now, you hadn't checked his pulse.

16 A No, not prior to that, but when he had that pulse,
17 the time I checked it.

18 Q But you didn't check the pulse till he's laying on
19 the ground and you can't get him up, right?

20 A Yes. Prior to that, no, he was doing fine. There
21 was no need to check the pulse.

22 Q How did you know he was doing fine? That's what
23 I'm trying to understand.

24 MR. O'NEAL: Asked and answered.

25 MS. ROSELLE: Okay. I'll rephrase it.

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1 BY MS. ROSELLE:

2 Q Is there anything, other than what you've told me,
3 that you did in that trailer that allowed you to
4 determine that Korey Stringer was doing fine
5 during the first 30 minutes or so that you were in
6 the trailer with him?

7 A No.

8 MR. O'NEAL: Can we take five minutes?

9 MS. ROSELLE: Sure.

10 (A recess was taken.)

11 MS. ROSELLE: Would you read the last
12 question, please?

13 (The last question was read.)

14 BY MS. ROSELLE:

15 Q During that first 30 minutes or so that you were
16 in the trailer, other than D.J., did anyone come
17 in the trailer at all?

18 A Not that I can recall.

19 Q Okay. Now, when you couldn't get Korey up, then
20 you sent D.J. to get Fred Zamberletti?

21 A Correct.

22 Q How long did it take from the time that you and
23 D.J. couldn't get Korey up to the time that Fred
24 Zamberletti got to the trailer?

25 A It was pretty short. When D.J. left, I had -- I

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1 believe I had -- I had more ice towels so I think
2 he ran and got me those right outside the door and
3 I was applying those and monitoring Korey's
4 vitals. I would say a minute or two.

5 Q Now, during that one to two minutes when you say
6 you were monitoring his vitals, other than
7 checking his pulse once, as you said, and noticing
8 that he was still breathing, did you do anything?

9 A Other than apply some more ice towels, after he
10 left, that's what I was doing.

11 Q Did you do anything else to monitor his vitals?

12 A No.

13 Q Did you ever take his blood pressure?

14 A We did not have a cuff in the trailer.

15 Q Did you have any type of medical equipment to do
16 any type of an assessment of Korey Stringer in
17 that trailer that you used?

18 A What type of medical equipment?

19 Q Blood pressure cuff, thermometer, any type of
20 thing like that.

21 A No.

22 Q So you just sat in the trailer, you and Korey?

23 A Yes.

24 Q And you were putting some ice towels on his body.
25 Was he pushing them off this time?

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1 A Not this time that I can recall, no.

2 Q How many ice towels would you say you put on him?

3 A I don't remember the exact number.

4 Q Okay. Now, you said Korey had cool, moist skin.

5 How did you observe that?

6 A Just by touch.

7 Q Had he stopped sweating?

8 A Not that I remember, no.

9 Q So he was still sweating?

10 A Still sweating.

11 Q So you had been in this trailer by now about 35
12 minutes and he was still sweating?

13 A As much as I can recall, yes.

14 Q And he had what you described here as a weak but
15 steady pulse?

16 A Correct.

17 Q And did you time the pulse to see what the speed
18 was at all?

19 A No, I didn't.

20 Q What do you mean by a weak pulse?

21 A It's just I thought it might be a little bit
22 stronger when you feel it, but it was -- I mean,
23 it was still steady and strong that he had it, but
24 it wasn't as strong as I thought it would be.

25 Q Do you know what a tympanic thermometer is?

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1 A If you're talking about the one you put in the
2 ear?

3 Q Yes.

4 A Yes.

5 Q Did you have any of those at training camp?

6 A Not that I can recall, no. At least not in the
7 trailer. We might have had one in the athletic
8 training room.

9 Q Did it ever cross your mind that you needed to
10 take Korey's temperature?

11 A At that point, no. I was more concerned about
12 trying to get him -- make sure he stayed cool.

13 Q At any time on July 31st, 2001, when you and Korey
14 Stringer were in that trailer together, did it
15 ever cross your mind to take his temperature?

16 A No, because when I felt his skin, he was cool and
17 moist.

18 Q At any time during the time that you and Korey
19 Stringer were in that trailer on July 31st, 2001,
20 did you ever make an assessment that he had a
21 heat-related illness?

22 A More towards the end when the paramedics were
23 getting there, when he started the
24 hyperventilating, the fast, shallow breathing.

25 Q But until he started the fast, shallow breathing,

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1 it never crossed your mind that there was a heat
2 problem here?

3 A When D.J. first came, I knew there was a concern.
4 That's when I first got concerned because that was
5 the first sign something was wrong. And my
6 thought was he had been in the trailer for a
7 while, that it was kind of strange, and it was a
8 cool trailer, that he would be having heat
9 problems at this time.

10 Q And when you say D.J. came, you're talking when
11 D.J. came with the cart to take Korey to the
12 athletic training room and you couldn't get him
13 off the floor?

14 A Correct.

15 Q Now, you say here that, "Fred and DJ arrived as
16 Korey's breathing became speedy and shallow." So
17 you're saying that at the time that Fred
18 Zamberletti and D.J. arrived -- and that was the
19 third time D.J. came to the trailer, correct?

20 A Correct.

21 Q Korey's breathing changed?

22 A Yeah. It picked up in pace.

23 Q Okay. And how do you know it was shallow?

24 A It wasn't like just when people take a deep
25 breath, like (indicating). It was more fast and